

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

In re:
RICHARD CHURCH
Debtor.

Case No. 8:15-bk-00295-CED
Chapter 13

**AMENDED MOTION TO MODIFY MORTGAGE-TRIAL
AND APPLICATION FOR ADDITIONAL ATTORNEY FEES**
(Re:, Loan #***7930)**

COMES NOW, the Debtor, Richard Church, by and through undersigned Counsel and files this, his Motion to Modify Mortgage-Trial and Application for Additional Attorney Fees, and in support thereof would state as follows:

1. The Debtor has sought a mortgage modification through Chapter 13 Mortgage Mediation Program.
2. The Debtor has been approved for the program with a six monthly trial period payments are \$2,338.97 beginning on November 1, 2015, Payable to Selene Finance.
3. The Debtor is completing step one of two-step documentation process.
4. That, after the six trial period payments have been made, Selene Finance will provide the final agreement within a reasonable amount of time.
5. That payments made to the Chapter 13 Trustee constitutes timely payment to Selene Finance.
6. The Trustee shall pay the first three trial payments from the adequate protection payments being held and the Debtor shall pay the remaining three direct to Selene Finance.
7. Payments should be sent by money order or certified bank check to the following address: Selene Finance, 9990 Richmond Avenue, Ste. 400 South, Huston, TX 77042.

8. That, in the event Debtor enters into a permanent mortgage modification agreement with Selene Finance, any pending foreclosure proceedings shall be dismissed immediately.

9. Debtor's counsel requests additional fees for the preparation and participation in the modification process in the amount of \$1800.00, with said fees payable through the Chapter 13 Plan as an administrative priority claim.

WHEREFORE, Debtor request this Court approve the Motion to Modify Mortgage, order Selene Finance to provide the final agreement within a reasonable amount of time after completion of the trial period, grant Debtor's counsel's application for additional fees of \$1800.00, and such other relief that may be deemed just and proper in the circumstances.

/s/ Laurie Blanton

Laurie Blanton

Fitzhugh & Blanton, P.A.

FBN 54483

1041 US 41 Bypass S

Venice, FL 34285

(941) 493-6577, (941) 493-5377 Fax

LaurieB@bankruptcyfitzhugh.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been sent by either electronic transmission or U.S. Mail this 23rd day of October, 2015 to:

US Trustee
501 Polk S
Timberlake Annex
Ste 1200
Tampa, FL 33602

Kelly Remick
Chapter 13 Trustee
PO Box 6099
Sun City Center, FL 33571

Alexandra R Kalman on behalf of Creditor Christiana Trust, A Division of Wilmington Savings Fund Society, FSB, as Trustee for Normandy Mortgage Loan Trust, Series 2013-18 as serviced by Selene Finance LP
akalman@lenderlegal.com

Selene Finance
PO Box 422039
Houston TX 77242

/s/ Laurie Blanton _____
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